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Attorneys for Defendant

**FOLLETT HIGHER EDUCATION GROUP,**

**LLC (fka Follett Higher Ed Group, Ltd.)**

*(Additional Counsel of record on next page)*

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

AARICA BRITTANY, an individual,

Plaintiff,

vs.

FOLLETT HIGHER EDUCATION  
GROUP, LLC; FOLLETT HIGHER ED  
GROUP, LTD; and DOES 1 through 20,  
inclusive,

Defendants.

Case No. 2:23-cv-06598-KK-AS

Assigned to Hon. Kenly Kiya Kato

**CLASS ACTION**

**JOINT STIPULATION TO  
DISMISS ACTION WITH  
PREJUDICE**

1 **AEGIS LAW FIRM, PC**  
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12  
13 Attorneys for Plaintiff Aarica Brittany,  
14 Individually and on behalf of all others similarly situated  
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1 This Joint Stipulation is made by and between Plaintiff Aarica Brittany  
2 (“Plaintiff”) and Defendant Follett Higher Education Group, LLC (formerly known  
3 as Follett Higher Ed Group, Ltd.) (“Defendant”) (Plaintiff and Defendant are  
4 referred to collectively as the “Parties” and individually as a “Party”) by and  
5 through their counsel of record.

6 **RECITALS**

7 A. WHEREAS, on June 16, 2023, Plaintiff filed this wage and hour  
8 putative class action complaint against Defendant in the Los Angeles County  
9 Superior Court.

10 B. WHEREAS, on August 11, 2023, Defendant removed this case to the  
11 U.S. District Court for the Central District of California (the “Action”).

12 C. WHEREAS, on September 6, 2023, Plaintiff filed a separate  
13 representative action pursuant to Labor Code § 2698, *et seq* (“PAGA”) in Los  
14 Angeles County Superior Court, Case No. 23STCV21385 (the “State Court  
15 Action”);

16 D. WHEREAS, on March 25, 2024 and April 24, 2024, the Parties  
17 attended private mediation with Kristin Rizzo, Esq., a respected wage and hour  
18 mediator, and agreed to globally settle this Action and the State Court Action  
19 (together the “Actions”);

20 E. WHEREAS, pursuant to the Parties’ settlement agreement, their  
21 proposed global settlement of the Actions was submitted to the State Court for the  
22 County of Los Angeles for review and approval in the State Court Action because  
23 the settlement was less than five million dollars (\$5,000,000);

24 F. WHEREAS, on February 5, 2025, the State Court granted final  
25 approval of the settlement and entered judgment;

26 G. WHEREAS, the Judgment is now final as there were no appeals to the  
27 State Court’s final approval order.

1 NOW THEREFORE, the Parties stipulate and agree as follows:

- 2 1. This action shall be dismissed with prejudice; and  
3 2. Each Party shall bear their own fees and costs in this Action.

4  
5 **IT IS SO STIPULATED.**

6  
7 Dated: April 14, 2025

VEDDER PRICE (CA), LLP

8  
9 By: /s/ Thomas H. Petrides

10 Thomas H. Petrides

11 Attorneys for Defendant  
12 FOLLETT HIGHER EDUCATION  
13 GROUP, LLC (fka Follett Higher Ed  
14 Group, Ltd.)

15 Dated: April 14, 2025

AEGIS LAW FIRM, PC

16  
17 By: /s/ Kristy R. Connolly

18 Jessica L. Campbell  
19 Kristy R. Connolly  
20 Kashif Haque  
21 Samuel A. Wong

22 Attorneys for Plaintiff  
23 AARICA BRITTANY

24 **ATTESTATION**

25 Pursuant to Local Rule 5-4.3.4(a)(2)(i), the filer attests that all other  
26 signatories listed, and on whose behalf the filing is submitted, concur in the filing's  
27 content and have authorized the filing.

1  
2 Dated: April 14, 2025

AEGIS LAW FIRM, PC

3  
4 By: /s/ Kristy R. Connolly

Jessica L. Campbell

Kristy R. Connolly

Kashif Haque

Samuel A. Wong

8 Attorneys for Plaintiff

AARICA BRITTANY